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I'm sorry it has taken me so long to share my comments, but I find a "mulling" period is necessary and beneficial as a rule.

First, the idea of E-biomed is great, possibly transforming, and well worth pursuing. I believe its success will hinge on the acceptance, support and cooperation of the scientific and academic communities, as well as several key publishers. I presume you know best how to work with the academic and scientific groups to gain their support and cooperation, so I won't comment on that. However, as written E-biomed will almost certainly invite strong opposition from the publishing community. Based on my experience negotiating site license agreements with both commercial and non-profit/society publishers, many will view E-biomed as a threat. Publishers need to see E-biomed as a solution to their problems, not a challenge to their continued existence. I am reminded of the current situation with Yugoslavia. The U.S. and NATO began with a noble objective, but the means don't seem to be achieving their end. Are you willing and able to win a "war" with publishers? Or will E-biomed be lost in the process?

Rapid dissemination of research results, the savings to individuals, laboratories, and institutions, and the enhanced and expanded presentation of research will still be positive outcomes, even if the position on publishers is softened. And I would hope once publishers are engaged in a cooperative agreement with E-biomed, influence can be brought to bear on their pricing practices more effectively and with less resistance than is likely with an open challenge.

Have you considered approaching some potential publishing partners to take part in a pilot project to demonstrate the feasibility of E-biomed? The National Academy of Sciences comes to mind as does the American Society for Biochemistry and Molecular Biology. Both have demonstrated a willingness to explore the potential of electronic publication as a means of expediting and improving the scholarly communication process for scientific research. Their experience could be used to assure other societies and non-profits that E-biomed can serve them well.

Also, have you considered requiring all NIH grantees to deposit an electronic version of their publications in E-biomed as a condition of an award? This would be in addition to the review process you envision, but if fewer publishers participate initially, this could provide a mechanism for "growing" the database. In connection with this, perhaps an agreement could be negotiated with publishers for limited copyright to publications resulting from NIH funded research. They would have exclusive rights anywhere from six months to five years, for example. After the publisher's exclusive copyright is exhausted, the article would enter the public domain and be accessible to anyone

through E-biomed. In addition to assuring wider dissemination of research results (eventually), this might solve the archiving or preservation concerns of many libraries as well. Rather than rely on publishers to maintain backfiles, E-biomed would assume this responsibility. In the print world, publishers have shown no sense of responsibility to assure the information they publish remains available beyond the current print run. They have left this to libraries. In the electronic world, will publishers behave differently? I'd rather not count on it.

Finally, why couldn't NCBI be responsible for E-biomed? Isn't it the logical next step from GenBank? It also makes the most sense if E-biomed becomes the official archive for the information, since a certain permanence and continuity can be assumed. Or is there an advantage in terms of buy-in to having this run by a member of the academic, research community?

In any case, the important thing is to get E-biomed started. Who knows how it will develop? I suspect its existence will change scholarly communication in ways not now foreseen. Further, while it may be acceptable for a government agency to predict the demise of scholarly publishing as we know it, it may be unwise to be seen as advocating it. And if this proposal starts a "war" with publishers, then all energy will go toward defense, not progress.

Thank you for the opportunity to comment.

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